

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

EARL ALLEN LEWIS,)
Plaintiff,) NO. 3:13-cv-0111
)
v.) JUDGE HAYNES
)
KENNETH BROWN, Individually and in his)
Official Capacity as a Deputy for the)
Dickson County Sheriff's Department;)
)
CLAYTON (NICK) JACKSON;)
)
AMANDA GIVENS MOBLEY;)
)
JANE GIVENS NEAL;)
)
JOHN DOES I – V, Individually and in their)
Official capacities as Deputies for the)
Dickson County Sheriff's Department)
)
Defendants.)

MOTION TO RESCHEDULE CASE MANAGEMENT CONFERENCE

Comes now the Defendant, KENNETH BROWN, INDIVIDUALLY, by and through counsel, and moves the Court to reschedule the Initial Case Management Conference currently set for April 15, 2013. In support of his motion Defendant Kenneth Brown states as follows:

1. Counsel for Kenneth Brown, Individually, was retained to represent Defendant Brown in his individual capacity just this afternoon and has not had adequate time to review and investigate this file.
2. Defendant Brown's answer is not due until April 25, 2013. (D.E. 10).

THEREFORE, Defendant KENNETH BROWN, INDIVIDUALLY, requests the

scheduled Initial Case Management Conference be rescheduled for a date after the April 25, 2013, deadline for this Defendant to file his answer.

Respectfully submitted,

BATSON NOLAN PLC

By: /s/ Mark Nolan

Mark Nolan, BPR No. 015859
Kathryn W. Olita, BPR No. 023075
Counsel for Defendant
KENNETH BROWN, INDIVIDUALLY
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been delivered via the Court's electronic filing system or other appropriate means to:

Richard Marshall Brooks
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Attorney for Plaintiff

Brent S. Usery
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Nashville, TN 37209
Attorney for Jane Givens Neal

on this 10th day of April, 2013.

BATSON NOLAN PLC

By: /s/ Mark Nolan